

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**JODY SMITH**, individually and on behalf of  
all others similarly situated,

*Plaintiff,*

v.

**EXPOSURE IS EVERYTHING LLC**  
**d/b/a Fluent**

*Defendant.*

Case No. 1:25-cv-425

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**NOTICE OF VOLUNTARY DISMISSAL**

COMES NOW Plaintiff Jody Smith, by and through the undersigned counsel, pursuant to FED. R. CIV. P. 55(a), and hereby voluntarily dismisses this action, without prejudice, with each party to bear its own fees and costs, pursuant to Rule 41(a)(1)(A)(i) of the FEDERAL RULES OF CIVIL PROCEDURE.

RESPECTFULLY SUBMITTED AND DATED this May 26, 2025.

/s/ Andrew Roman Perrong

Andrew Roman Perrong, Esq.

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Lead Attorney for Plaintiff and the Proposed Class

**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

Dated: May 26, 2025

/s/ Andrew Roman Perrong  
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